

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Newport News Division**

**JAMES T. PARKER, II and  
DEBRA L. PARKER,**

**Plaintiffs,**

**v.**

**Civil Action No.: 4:18cv00140**

**FREEDOM MORTGAGE  
CORPORATION, *et al.*,**

**Defendants.**

**PLAINTIFF'S MOTION IN LIMINE TO ESTABLISH FACTS NOT IN DISPUTE**

Plaintiffs James T. Parker II and Debra Parker, move *in limine* to prohibit the Defendant Freedom Mortgage Corporation from making suggestions, statements, argument, or introducing evidence or witnesses at trial. Plaintiffs also move *in limine* to be allowed to introduce certain facts. For the reasons explained more fully in the accompanying Memorandum of Law, the Plaintiff seeks entry of an order to:

1. Prohibit any suggestion or evidence that Defendant did anything to learn of its obligations or requirements under the FCRA.
2. Prohibit any suggestion or evidence that Defendant's reporting of the Plaintiffs' mortgage account at issue in this lawsuit was a mistake or error.
3. Any information not actually considered in the dispute process used for Plaintiffs' disputes.
4. Prohibit any suggestion or evidence that Plaintiffs are barred from bringing this action in this Court, or that they are in the wrong court, or any other argument that they are in an improper venue.
5. Prohibit any reference to the June 20, 2017 letter Defendant's Counsel sent to Plaintiff's Counsel.



Counsel

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Craig C. Marchiando, VSB #89736  
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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 4th day of October 2019, I caused a true and correct copy of the foregoing to be filed using the Clerk of Court's CM/ECF system, which then sent a notice of electronic filing to all Counsel of Record.

By: /s/  
Counsel

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